

JOHN D. CLINE (CA State Bar No. 237759)
50 California Street, Suite 1500
San Francisco, CA 94111
Telephone: (415) 662-2260 | Facsimile: (415) 662-2263
Email: cline@johndclinelaw.com

KEVIN M. DOWNEY (Admitted Pro Hac Vice)
LANCE A. WADE (Admitted Pro Hac Vice)
AMY MASON SAHARIA (Admitted Pro Hac Vice)
KATHERINE TREFZ (CA State Bar No. 262770)
WILLIAMS & CONNOLLY LLP
725 Twelfth Street, NW
Washington, DC 20005
Telephone: (202) 434-5000 | Facsimile: (202) 434-5029
Email: KDowney@wc.com; LWade@wc.com; ASaharia@wc.com; KTrefz@wc.com

Attorneys for Defendant ELIZABETH A. HOLMES

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,)	Case No. CR-18-00258-EJD
)	
Plaintiff,)	DECLARATION OF AMY MASON SAHARIA
)	IN SUPPORT OF MOTION TO DISMISS
v.)	SECOND AND THIRD SUPERSEDING
)	INDICTMENTS IN PART FOR LACK OF
ELIZABETH HOLMES and)	NOTICE OR, IN THE ALTERNATIVE, FOR A
RAMESH "SUNNY" BALWANI,)	BILL OF PARTICULARS
)	
Defendants.)	
)	Hon. Edward J. Davila
)	
)	

I, AMY MASON SAHARIA, declare as follows:

1. I represent Defendant Elizabeth Holmes and have been admitted to practice *pro hac vice* in the above-captioned matter. I submit this declaration in support of Ms. Holmes' Motion to Dismiss Second and Third Superseding Indictments in Part for Lack of Notice Or, In the Alternative, A Bill of Particulars ("Motion"). I attest to the following facts upon which the motion relies.

2. Attached to the motion are five exhibits. The content of the exhibits are as follows:

a. Exhibit A is a true and correct copy of a March 6, 2020, letter from Assistant United States Attorney John Bostic providing notice of evidence the government intends to introduce at trial pursuant to Federal Rule of Evidence 404(b).

b. Exhibit B is a true and correct copy of an April 24, 2020, letter from Lance Wade to government counsel concerning the allegations in the government's draft Superseding Information.


c. Exhibit C is a true and correct copy of a May 4, 2020, email from Assistant United States Attorney Robert Leach to Lance Wade.

d. Exhibit D is a true and correct copy of an August 21, 2020, email from Assistant United States Attorney Robert Leach to Lance Wade.

e. Exhibit E is a true and correct copy of the government's draft Superseding Information provided to defense counsel by Assistant United States Attorney Robert Leach on April 13, 2020.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Executed this 28th day of August, 2020 in Chevy Chase, MD.



AMY MASON SAHARIA
Attorney for Elizabeth Holmes